

## REMARKS

### Remarks to address the 102(e) rejection of claims 1-36.

The Office Action has rejected claims 1-36 under 35 U.S.C. 102(e) as being anticipated by Beyers (US 6072804). Applicants respectfully traverse the rejection of claims 1-36. In response, Applicants provide claim amendments and remarks below to support Applicants' traversal of the rejection.

**Claim 1:** Applicants have amended claim 1 to add limitations to the frames to distinguish claim 1 over Beyers. The individual library frames additionally comprising a plurality of tapes, a plurality of tape drive mechanisms for reading and writing data to said tapes, and one or more controllable robot members to move said tapes to and from said tape drive mechanisms. Support for this limitation is on page 1, lines 10-20 of Applicants' filed patent application. Applicants submit that Beyers does not disclose Applicants' claim 1 because there is no library frame in a multi-frame tape library system where the individual library frames comprise a plurality of tapes, a plurality of tape drive mechanisms for reading and writing data to said tapes and one or more controllable robot members to move said tapes to and from said tape drive mechanisms disclosed by Beyers.

Applicants respectfully submit that Applicants' claim amendment and remarks above overcome the 102(e) rejection of independent claim 1 and that no new matter is introduced. Applicants therefore submit that independent claim 1 is in condition for allowance.

**Claims 2-7:** Applicants respectfully submit that Applicants' remarks above overcome the 102(e) rejection of independent claim 1 and that claims 2-7 depend upon an allowable independent claim 1. Applicants therefore submit that dependent claims 2-7 are in condition for allowance.

**Claim 8:** Applicants have amended claim 8 to add limitations to the frames to distinguish claim 8 over Beyers. The limitation added is at least one frame comprising "an outer door which may be opened when said at least one frame is under repair". Support for this limitation is on page 2, lines 1-5 of Applicants' filed patent application. Applicants submit that Beyers does not disclose Applicants' claim 8 because there is no library frame in a multi-frame tape library system with an outer door which may be opened when said at least one frame is under repair disclosed by Beyers.

Applicants respectfully submit that Applicants' claim amendment and remarks above overcome the 102(e) rejection of independent claim 8 and that no new matter is introduced. Applicants therefore submit that independent claim 8 is in condition for allowance.

**Claims 9-12:** Applicants respectfully submit that Applicants' amendment and remarks above overcome the 102(e) rejection of independent claim 8 and that claims 9-12 depend upon an allowable independent claim 8. Applicants therefore submit that dependent claims 9-12 are in condition for allowance.

**Claim 13:** Applicants have amended claim 13 to add limitations to the frames to distinguish claim 13 over Beyers. The limitation added is “each of said plurality of frames comprising a plurality of tapes, a plurality of tape drive mechanisms for reading and writing data to said tapes, and one or more controllable robot members to move said tapes to and from said tape drive mechanisms”. Support for this limitation is on page 1, lines 10-20 of Applicants’ filed patent application. Applicants submit that Beyers does not disclose Applicants’ claim 13 because there is no library frame in a multi-frame tape library system where each of said plurality of frames comprises a plurality of tapes, a plurality of tape drive mechanisms for reading and writing data to said tapes and one or more controllable robot members to move said tapes to and from said tape drive mechanisms disclosed by Beyers.

Applicants respectfully submit that Applicants’ claim amendment and remarks above overcome the 102(e) rejection of independent claim 13 and that no new matter is introduced. Applicants therefore submit that independent claim 13 is in condition for allowance.

**Claims 14-16:** Applicants respectfully submit that Applicants’ amendment and remarks above overcome the 102(e) rejection of independent claim 13 and that claims 14-16 depend upon an allowable independent claim 13. Applicants therefore submit that dependent claims 14-16 are in condition for allowance.

**Claim 17:** Applicants have amended claim 17 to add limitations to the frames to distinguish claim 17 over Beyers. The individual library frames additionally comprising a plurality of tapes,

a plurality of tape drive mechanisms for reading and writing data to said tapes, and one or more controllable robot members to move said tapes to and from said tape drive mechanisms. Support for this limitation is on page 1, lines 10-20 of Applicants' filed patent application. Applicants submit that Beyers does not disclose Applicants' claim 17 because there is no library frame in a multi-frame tape library system where the individual library frames comprise a plurality of tapes, a plurality of tape drive mechanisms for reading and writing data to said tapes and one or more controllable robot members to move said tapes to and from said tape drive mechanisms disclosed by Beyers.

Applicants respectfully submit that Applicants' claim amendment and remarks above overcome the 102(e) rejection of independent claim 17 and that no new matter is introduced. Applicants therefore submit that independent claim 17 is in condition for allowance.

**Claims 18-21:** Applicants respectfully submit that Applicants' amendment and remarks above overcome the 102(e) rejection of independent claim 17 and that claims 18-21 depend upon an allowable independent claim 17. Applicants therefore submit that dependent claims 18-21 are in condition for allowance.

**Claim 22:** Applicants have amended claim 22 to add limitations to the frames to distinguish claim 22 over Beyers. The individual library frames additionally comprising a plurality of tapes, a plurality of tape drive mechanisms for reading and writing data to said tapes, and one or more controllable robot members to move said tapes to and from said tape drive mechanisms. Support for this limitation is on page 1, lines 10-20 of Applicants' filed patent application. Applicants

submit that Beyers does not disclose Applicants' claim 22 because there is no library frame in a multi-frame tape library system where the individual library frames comprise a plurality of tapes, a plurality of tape drive mechanisms for reading and writing data to said tapes and one or more controllable robot members to move said tapes to and from said tape drive mechanisms disclosed by Beyers.

Applicants respectfully submit that Applicants' claim amendment and remarks above overcome the 102(e) rejection of independent claim 22 and that no new matter is introduced. Applicants therefore submit that independent claim 22 is in condition for allowance.

**Claims 23-26:** Applicants respectfully submit that Applicants' amendment and remarks above overcome the 102(e) rejection of independent claim 22 and that claims 23-26 depend upon an allowable independent claim 22. Applicants therefore submit that dependent claims 23-26 are in condition for allowance.

**Claim 27:** Applicants have amended claim 27 to add limitations to the frames to distinguish claim 27 over Beyers. The limitation added is "each of said plurality of frames comprising a plurality of tapes, a plurality of tape drive mechanisms for reading and writing data to said tapes, and one or more controllable robot members to move said tapes to and from said tape drive mechanisms". Support for this limitation is on page 1, lines 10-20. Applicants submit that Beyers does not disclose Applicants' claim 27 because there is no library frame in a multi-frame tape library system where each of said plurality of frames comprises a plurality of tapes, a

plurality of tape drive mechanisms for reading and writing data to said tapes and one or more controllable robot members to move said tapes to and from said tape drive mechanisms disclosed by Beyers.

Applicants respectfully submit that Applicants' claim amendment and remarks above overcome the 102(e) rejection of independent claim 27 and that no new matter is introduced. Applicants therefore submit that independent claim 27 is in condition for allowance.

**Claims 28-30:** Applicants respectfully submit that Applicants' amendment and remarks above overcome the 102(e) rejection of independent claim 27 and that claims 28-30 depend upon an allowable independent claim 27. Applicants therefore submit that dependent claims 28-30 are in condition for allowance.

**Claim 31:** Applicants have amended claim 31 to add limitations to the frames to distinguish claim 31 over Beyers. The individual library frames additionally comprising a plurality of tapes, a plurality of tape drive mechanisms for reading and writing data to said tapes, and one or more controllable robot members to move said tapes to and from said tape drive mechanisms. Support for this limitation is on page 1, lines 10-20 of Applicants' filed patent application. Applicants submit that Beyers does not disclose Applicants' claim 31 because there is no library frame in a multi-frame tape library system where the individual library frames comprise a plurality of tapes, a plurality of tape drive mechanisms for reading and writing data to said tapes and one or more controllable robot members to move said tapes to and from said tape drive mechanisms disclosed by Beyers.

Applicants respectfully submit that Applicants' claim amendment and remarks above overcome the 102(e) rejection of independent claim 31 and that no new matter is introduced. Applicants therefore submit that independent claim 31 is in condition for allowance.

**Claims 32-33:** Applicants respectfully submit that Applicants' amendment and remarks above overcome the 102(e) rejection of independent claim 31 and that claims 32-33 depend upon an allowable independent claim 31. Applicants therefore submit that dependent claims 32-33 are in condition for allowance.

**Claim 34:** Applicants have amended claim 34 to add limitations to the frames to distinguish claim 34 over Beyers. The limitation added is "each of said plurality of frames comprising a plurality of tapes, a plurality of tape drive mechanisms for reading and writing data to said tapes, and one or more controllable robot members to move said tapes to and from said tape drive mechanisms". Support for this limitation is on page 1, lines 10-20 of Applicants' filed patent application. Applicants submit that Beyers does not disclose Applicants' claim 34 because there is no library frame in a multi-frame tape library system where each of said plurality of frames comprises a plurality of tapes, a plurality of tape drive mechanisms for reading and writing data to said tapes and one or more controllable robot members to move said tapes to and from said tape drive mechanisms disclosed by Beyers.

Applicants respectfully submit that Applicants' claim amendment and remarks above overcome the 102(e) rejection of independent claim 34 and that no new matter is introduced. Applicants therefore submit that independent claim 34 is in condition for allowance.

**Claims 35-36:** Applicants respectfully submit that Applicants' remarks above overcome the 102(e) rejection of independent claim 34 and that claims 35-36 depend upon an allowable independent claim 34. Applicants therefore submit that dependent claims 35-36 are in condition for allowance.

The foregoing amendments and arguments are submitted to place the application in condition for allowance. Applicants respectfully submit that claims 1-36 are patentable over Beyers (US 6072804) under 35 U.S.C. 102 and that no new matter is introduced in this amendment. Applicants respectfully request allowance for claims 1-36.

Respectfully submitted,  
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